

MICHELE BECKWITH
Acting United States Attorney
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099
Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMAR JONES et al,

Defendants.

CASE NO. 1:24-CR-00209-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

IT IS HEREBY STIPULATED by and between Michele Beckwith, Acting United States Attorney and Robert L. Veneman-Hughes, Assistant U.S. Attorney, as well as Eric Kersten, attorney for defendant JAMAR JONES, and Anthony Capozzi, attorney for defendant STEPHANIE FERREIRA, and Steven Crawford, attorney for defendant JERMEN RUDD that the status conference set for January 22, 2025 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to March 26, 2025 at 1:00 p.m.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. The parties need additional time to further investigate/explore matters related to resolving the case or setting a trial date.

2. By this stipulation, defendants now move to continue the status conference, and to exclude time from January 22, 2025 to March 26, 2025.

3. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the initial discovery associated with this
2 case includes investigative reports, and related documents, photographs, etc., in electronic form.
3 All of this discovery has been either produced directly to counsel and/or made available for
4 inspection and copying. Defense would like additional time to review discovery, and investigate
5 the foundation for a resolution by plea or trial further.

6 b) The government does not object to the continuance.

7 c) An ends-of-justice delay is particularly apt in this case because:

- 8 • Defendant needs additional time to review discovery, and conduct additional
9 investigation; and
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11 • The parties need additional time to investigate/explore matters related to
12 proceeding via plea or trial.

13 d) Based on the above-stated findings, the ends of justice served by continuing the
14 case as requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.

16 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 et seq., within which trial must commence, the time period of September 6, 2024 to March 26,
18 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv)
19 because it results from a continuance granted by the Court at defendants' request on the basis of
20 the Court's finding that the ends of justice served by taking such action outweigh the best interest
21 of the public and the defendants in a speedy trial.

22 **[Remainder of page intentionally left blank.]**

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25 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
26 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
27 must commence.
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1 Dated: January 15, 2025

Respectfully submitted,

2 MICHELE BECKWITH
3 Acting United States Attorney

4 By /s/ Robert L. Veneman-Hughes
5 ROBERT L. VENEMAN-HUGHES
6 Assistant United States Attorney

7 Dated: January 15, 2025

/s/ Eric Kersten
8 ERIC KERSTEN
9 Attorney for Defendant Jamar JONES

10 Dated: January 15, 2025

/s/ Anthony Capozzi
11 ANTHONY CAPOZZI
12 Attorney for Defendant Stephanie FERREIRA

13 Dated: January 15, 2025

/s/ Steven Crawford
14 STEVEN CRAWFORD
15 Attorney for Defendant Jermen RUDD

16 **ORDER**

17 IT IS SO ORDERED that the motion hearing set for January 22, 2025 is vacated and the status
18 conference is continued from January 22, 2025, to **March 26, 2025, at 1:00 p.m. in Courtroom 8 before**
19 **Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and
20 (h)(7)(B)(iv).

21 IT IS SO ORDERED.

22 Dated: **January 15, 2025**

/s/ Barbara A. McAuliffe
23 UNITED STATES MAGISTRATE JUDGE
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